

To: Polek, Jim[Polek.Jim@epa.gov]; Johnson, Kathleen[Johnson.Kathleen@epa.gov]
Cc: Miller, Amy[Miller.Amy@epa.gov]
From: Jones, Joel E.
Sent: Fri 11/1/2013 12:00:38 AM
Subject: Re: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Yes, that's right. The abatement odor noted there's no South Coast permit for RDX, The complaints and enforcement action were related to odor-rotten eggs smell.

From: Polek, Jim
Sent: Thursday, October 31, 2013 4:53:39 PM
To: Johnson, Kathleen; Jones, Joel E.
Cc: Miller, Amy
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Kathleen,

Yes, they have a temporary permit from LA San to discharge their wastewater. I do not think that they have an air permit. I am not sure about the status of an air permit. It would be a good question for Air Div. I do not have access to CAA databases and was relying on press releases.

Jim

From: Johnson, Kathleen
Sent: Thursday, October 31, 2013 4:31 PM
To: Jones, Joel E.; Polek, Jim
Cc: Miller, Amy
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Thanks jim. Its still a little unclear to me – do they have a temporary permit from LA county San to get rid of existing wastewater only? And do they need an air permit?

Kathleen H. Johnson

Director, Enforcement Division

U.S. EPA - Region 9

75 Hawthorne Street ENF-1

San Francisco, CA 94015

415/972-3873

johnson.kathleen@epa.gov

From: Jones, Joel E.

Sent: Thursday, October 31, 2013 4:29 PM

To: Ryerson.Teddy

Cc: Miller, Amy; Johnson, Kathleen; Gaudario, Abigail

Subject: Fw: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Hi Teddy, please see attached summary re Santa Fe Springs.

- Joel

From: Polek, Jim

Sent: Thursday, October 31, 2013 4:20:40 PM

To: Jones, Joel E.

Cc: Greenberg, Ken; McDaniel, Doug; Miller, Amy; Johnson, Kathleen

Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Joel,

I pulled together as much information as I could about RDX Santa Fe Springs. Probably more detail than necessary, but it is easier to cut than add.

Let me know if you have any questions or concerns.

I am on AL tomorrow, but if you need to reach me you can call my cell, 415-730-8711.

Happy Halloween!

Jim

From: Jones, Joel E.
Sent: Wednesday, October 30, 2013 3:21 PM
To: Polek, Jim
Subject: Fw: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Hi Jim, please see below re previous ownership ? at the site. Talk w/you tomorrow. Thanks.
- Joel

From: Johnson, Kathleen
Sent: Wednesday, October 30, 2013 2:27:25 PM
To: Jones, Joel E.
Cc: Miller, Amy; Grove, Jim
Subject: FW: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Joel,

Please talk with Jim about what he knows from pulling the compliance history. It used to be something else and has recently morphed into this facility with wastewater stuff. The former name of the facility was Powerine, which rings a lot of old superfund bells for me. I will ask Dusty if he knows anything.

Kathleen H. Johnson

Director, Enforcement Division

U.S. EPA - Region 9

75 Hawthorne Street ENF-1

San Francisco, CA 94015

415/972-3873

johnson.kathleen@epa.gov

From: Ryerson.Teddy
Sent: Wednesday, October 30, 2013 2:01 PM
To: Jones, Joel E.; Johnson, Kathleen
Cc: Miller, Amy
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Santa Fe Springs/RDX is the facility we know the least about. Can you send a stand-alone briefing paper that includes background information regarding the facility and the site, ownership, size of the operations, type of business, information about the site and the neighborhood, etc. You should pull into that paper the relevant information you've provided below that is specific to Santa Fe Springs/RDX. Please let me know if you have any questions. Thanks!

From: Jones, Joel E.
Sent: Wednesday, October 30, 2013 11:08 AM
To: Ryerson.Teddy; Johnson, Kathleen
Cc: Miller, Amy
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Please see CWA compliance summary below re Santa Fe Springs 'Ridgeline- RDX' and Allenco.

We reviewed Los Angeles County Sanitation Districts' Semi-Annual Compliance Report for January 1st – June 30, 2013 to assess the compliance status of the three facilities mentioned in the attachments to the email below:

- Allenco Energy (oil extraction) does not appear to be an industrial user discharging to a POTW. They do not appear in the compliance report as a categorical or non-categorical discharger.

- RDX Technologies (formerly Ridgeline Energy Services) (centralized wastewater treatment) is reported to be in SNC status for failure to provide reports for compliance schedules, self-monitoring data, or categorical standards within the 45 days of the due date. They also exceeded the daily maximum for lead on January 10, 2013.
- Exide Technologies (spent lead-acid recycler) was in compliance during this reporting period.

According to South Coast AQMD's 10/18/13 press release regarding their Order for Abatement against RDX, they required them to not accept any additional wastewater, to promptly treat and dispose of existing wastewater to the sewer, and permanently remove old leaky tanks. The order resulted after a large hydrogen sulfide gas leak from holes in the roofs of old tanks resulted in over 600 community complaints of foul odors. The press release indicates that SCAQMD is reviewing permit applications for a new wastewater treatment that does not use the old tanks, but states that no permits have been issued. However, a 10/17/13 RDX press release states that they were granted a wastewater discharge permit for their new multi-tier water treatment system at the air quality hearing conducted on 10/16/13.

Jim Polek spoke with David Snyder at Los Angeles County Sanitation District and he indicated the RDX is trying to get their wastewater treatment online. They were issued a temporary permit to treat wastewater and it will take them a few months to treat all wastewater on site. They then need to deal with sludge disposal and tank removal. The facility is an old oil refinery and the tanks on site are from those operations. David Snyder confirmed that Exide has been in compliance with their wastewater disposal. He indicated that Allenco Energy did not discharge to the county sewer and they may discharge to the LA City sewer.

Jim also spoke with Sonny Berberabe at the City of Los Angeles Bureau of Sanitation and he could not find a permit for Allenco Energy. He did find a 2011 inspection report that indicated that the facility does not discharge to the sewer so they were not issued a permit. The report indicated that seven out of 19 wells were in operation. He is going to check with other staff and call me next week if he finds any additional information.

I also checked RCRAInfo and DTSC's manifest database to see if any of these facilities are hazardous waste generators (I knew Exide was) and here is what I found:

- Allenco is a generator of California-only hazardous waste (CAL 000 365 174) and they manifested off 800 pounds of oily debris and PPE (CA 352 organic solids) on 2/10/12. They are not in our system so I do not know if they have been inspected.
- RDX Technologies is not in RCRAInfo and the Santa Fe Springs facility is not in DTSC's manifest database. Interesting, they cannot ship off oily sludge without an EPA ID number.
- Exide Technologies is in SNC status in RCRAInfo. They are under an order from DTSC, who is working closely with air district, to determine if facility should be allowed to operate. According to DTSC's web site, Exide had an appearance in LA Superior Court on October 22, 2013 for the judge to determine if he should lift his ruling that reopened the facility in June 2013, which overruled DTSC's order closing the facility in April 2013.

From: Ryerson.Teddy
Sent: Wednesday, October 30, 2013 10:14 AM
To: Johnson, Kathleen
Cc: Jones, Joel E.; Miller, Amy
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Thanks much. Also wanted you to see this note, from Nahal yesterday:

[REDACTED]

From: Johnson, Kathleen
Sent: Wednesday, October 30, 2013 9:55 AM
To: Ryerson.Teddy
Cc: Jones, Joel E.; Miller, Amy
Subject: FW: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Teddy,

Joel is pulling together info on Santa Fe Springs and Exide. Attached is an air paper which describes the sitch at Exide with respect to air issues, which of course is now updated by South Coast's issuance of an order.

Kathleen H. Johnson

Director, Enforcement Division

U.S. EPA - Region 9

75 Hawthorne Street ENF-1

San Francisco, CA 94015

415/972-3873

johnson.kathleen@epa.gov

From: Jones, Joel E.

Sent: Friday, October 25, 2013 9:55 AM

To: Adams, Elizabeth

Cc: Johnson, Kathleen

Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Hi Elizabeth,

Thank you again for the background summary materials for the Oct8 public meeting re Exide facility. Per Teddy's message re Exide (among other facilities of concern to Senator Boxer), I think this summary would be useful to share w/Jared if you haven't already. I understand you're also proposing to approve South Coast's Pb attainment plan in a few weeks. Please let me know what you'd suggest. Thanks.

- Joel

